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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 XAVIER AND JOHN'S REAL ESTATE
 12 AND INVESTMENTS SERIES LLC 6, a
 13 Nevada limited liability company,

14 Plaintiff,
 15 v.
 16 HSBC BANK USA AS TRUSTEE FOR
 17 NAAC 2006-AR3; a national banking
 association; DOES I through X; and ROE
 BUSINESS ENTITIES I through X, inclusive,

18 Defendants.

Case No. 2:25-cv-00277-BNW

**STIPULATION AND ORDER TO
 EXTEND BRIEFING DEADLINES ON
 PLAINTIFF'S MOTION TO REMAND
 TO STATE COURT AND FOR
 ATTORNEY'S FEES AND COSTS
 UNDER 28 U.S.C. 1447(C)**

[ECF Nos. 10, 11]

(First Request)

19 THIS STIPULATION is entered into by and between Plaintiff Xavier and John's Real
 20 Estate and Investments Series LLC 6 ("Xavier and John's") and Defendant HSBC Bank USA
 21 ("HSBC", and together with Xavier and John's, the "Parties"), by and through undersigned counsel,
 22 to extend the deadline to file the Motion to Remand deadline from March 5, 2025 to March 19,
 23 2025 based on the following:

24 1. On February 19, 2025, Xavier and John's filed a Motion to Remand ("Remand
 25 Motion") [ECF No. 10] and a Motion For Attorney's Fees and Costs Under 28 U.S.C. 1447(c)
 26 ("Fees Motion") [ECF No. 11.]

1 2. HSBC's current deadline to respond to the Remand Motion and the Fees Motion is
 2 March 5, 2025.

3 3. The Parties are actively engaging in early resolution discussions. To allow early
 4 resolution discussions to develop prior to incurring unnecessary legal fees, the Parties seek an
 5 extension of time for HSBC to respond to the Remand Motion and the Fees Motion.

6 NOW THEREFORE, based on the foregoing and subject to Court approval, the Parties
 7 agree as follows:

8 1. The Parties stipulate and agree to extend the deadline for HSBC to respond to the
 9 Remand Motion and the Fees Motion, up to and including **March 19, 2025**.

10 2. The Parties further stipulate and agree to extend the deadline for Xavier and John's
 11 to file its reply in support of the Remand Motion and the Fees Motion, up to and including **March**
 12 **26, 2025**.

13 3. This extension request is sought in good faith and is not made for the purpose of
 14 delay.

15 **IT IS SO STIPULATED.**

16 Dated: March 3, 2025.

17 Dated: March 3, 2025.

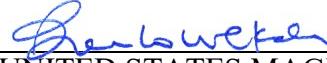
18 HONG & HONG LAW OFFICE

19 SNELL & WILMER L.L.P.

20 By: /s/ Joseph Y. Hong
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 22 Attorneys for Plaintiff Xavier and John's
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23 By: /s/ Jennifer B. Lustig
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 25 Attorneys for Defendant HSBC Bank USA

26 **IT IS SO ORDERED.**

27 
 28 UNITED STATES MAGISTRATE JUDGE

29 DATED: 3/5/2025

1 Respectfully submitted by:

2 SNELL & WILMER L.L.P.

3 By: /s/ Jennifer B. Lustig

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